

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

WEST VIRGINIA MEDICAL INSTITUTE, INC.,

PLAINTIFF,

VS.

CIVIL ACTION NO. 2:15-cv-13449

**INNOVATION RESOURCE GROUP, LLC
d/b/a APS HEALTHCARE MIDWEST, a
Wisconsin limited liability company,
KEPRO ACQUISITIONS, INC., a Pennsylvania
corporation, WEST VIRGINIA DEPARTMENT
OF ADMINISTRATION, PURCHASING DIVISION,
a West Virginia agency, WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN
RESOURCES, West Virginia agency, ANGELA HOBBS,
an individual, and KRISTYN TAYLOR, an individual,**

DEFENDANTS.

ANSWER OF DEFENDANTS, ANGELA HOBBS AND KRISTYN TAYLOR

Now come the Defendants, Angela Hobbs and Kristyn Taylor, by counsel, Timothy J. LaFon, and for their Answer to the Complaint states as follows:

1. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 1 of the Plaintiff's Complaint.
2. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 2 of the Plaintiff's Complaint.
3. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 3 of the Plaintiff's Complaint and therefore deny the same.
4. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 4 of the Plaintiff's Complaint.

5. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 5 of the Plaintiff's Complaint.

6. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 6 of the Plaintiff's Complaint.

7. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 7 of the Plaintiff's Complaint.

8. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 8 of the Plaintiff's Complaint and therefore deny the same.

9. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 of the Plaintiff's Complaint and therefore deny the same.

10. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 10 of the Plaintiff's Complaint and therefore demand strict proof thereof.

11. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 of the Plaintiff's Complaint and therefore deny the same.

12. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 of the Plaintiff's Complaint and therefore deny the same.

13. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 13 of the Plaintiff's Complaint and therefore deny the same.

14. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 of the Plaintiff's Complaint and therefore deny the same.

15. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 of the Plaintiff's Complaint and therefore deny the same.

16. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 of the Plaintiff's Complaint and therefore deny the same.

17. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 of the Plaintiff's Complaint and therefore deny the same.

18. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 of the Plaintiff's Complaint and therefore deny the same.

19. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 of the Plaintiff's Complaint and therefore deny the same.

20. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 20 of the Plaintiff's Complaint and therefore deny the same.

21. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 of the Plaintiff's Complaint and therefore deny the same.

22. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22 of the Plaintiff's Complaint and therefore deny the same.

23. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 of the Plaintiff's Complaint and therefore deny the same.

24. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 of the Plaintiff's Complaint and therefore deny the same.

25. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 25 of the Plaintiff's Complaint and therefore deny the same.

26. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 26 of the Plaintiff's Complaint and therefore deny the same.

27. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 27 of the Plaintiff's Complaint and therefore deny the same.

28. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 of the Plaintiff's Complaint and therefore deny the same.

29. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 of the Plaintiff's Complaint and therefore deny the same.

30. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 of the Plaintiff's Complaint and therefore deny the same.

31. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 of the Plaintiff's Complaint and therefore deny the same.

32. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 of the Plaintiff's Complaint and therefore deny the same.

33. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 of the Plaintiff's Complaint and therefore deny the same.

34. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 34 of the Plaintiff's Complaint and therefore deny the same.

35. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 of the Plaintiff's Complaint and therefore deny the same.

36. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 36 of the Plaintiff's Complaint and therefore deny the same.

37. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37 of the Plaintiff's Complaint and therefore deny the same.

38. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 of the Plaintiff's Complaint and therefore deny the same.

39. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 of the Plaintiff's Complaint and therefore deny the same.

40. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 of the Plaintiff's Complaint and therefore deny the same.

41. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 41 of the Plaintiff's Complaint and therefore deny the same.

42. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 of the Plaintiff's Complaint and therefore deny the same.

43. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 of the Plaintiff's Complaint and therefore deny the same.

44. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 of the Plaintiff's Complaint and therefore deny the same.

45. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 of the Plaintiff's Complaint and therefore deny the same.

46. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 of the Plaintiff's Complaint and therefore deny the same.

47. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 of the Plaintiff's Complaint and therefore deny the same.

48. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 48 of the Plaintiff's Complaint and therefore deny the same.

49. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 of the Plaintiff's Complaint and therefore deny the same.

50. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 of the Plaintiff's Complaint and therefore deny the same.

51. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 of the Plaintiff's Complaint and therefore deny the same.

52. Paragraph 52 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

53. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 of the Plaintiff's Complaint and therefore deny the same.

54. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54 of the Plaintiff's Complaint and therefore deny the same.

55. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 55 of the Plaintiff's Complaint and therefore deny the same.

56. Paragraph 56 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

57. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 of the Plaintiff's Complaint and therefore deny the same.

58. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 of the Plaintiff's Complaint and therefore deny the same.

59. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 of the Plaintiff's Complaint and therefore deny the same.

60. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 of the Plaintiff's Complaint and therefore deny the same.

61. The Defendants, Angela Hobbs and Kristyn Taylor, lack knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 of the Plaintiff's Complaint and therefore deny the same.

63. Paragraph 63 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

64. Paragraph 64 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

65. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 65 of the Plaintiff's Complaint.

66. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 66 of the Plaintiff's Complaint and therefore demand strict proof thereof.

67. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 67 of the Plaintiff's Complaint and therefore demand strict proof thereof.

68. The Defendants, Angela Hobbs and Kristyn Taylor, admit the allegations set forth in Paragraph 68 of the Plaintiff's Complaint.

69. The Defendants, Angela Hobbs and Kristyn Taylor, admit they downloaded certain documents and e-mails; however, deny the amount and the remaining allegations set forth in Paragraph 69 of the Plaintiff's Complaint.

70. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 70 of the Plaintiff's Complaint and therefore demand strict proof thereof.

71. The Defendants, Angela Hobbs and Kristyn Taylor, deny the

allegations set forth in Paragraph 71 of the Plaintiff's Complaint and therefore demand strict proof thereof.

72. The Defendants, Angela Hobbs and Kristyn Taylor, admit they have certain documents in their possession; however, deny the remaining allegations set forth in Paragraph 72 of the Plaintiff's Complaint.

73. The Defendants, Angela Hobbs and Kristyn Taylor, admit they possess certain e-mails and documents as set forth in Paragraph 73 of the Plaintiff's Complaint.

74. Paragraph 74 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

75. Paragraph 75 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

76. Paragraph 76 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

77. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 77 of the Plaintiff's Complaint and therefore demand strict proof thereof.

78. Paragraph 78 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

79. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 78 of this Answer to Plaintiff's Complaint in response to Paragraph 79 of Plaintiff's Complaint.

80. Paragraph 80 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

81. Paragraph 82 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

83. Paragraph 83 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

84. Paragraph 84 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

85. Paragraph 85 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

86. Paragraph 86 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

87. Paragraph 87 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

88. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 87 of this Answer to Plaintiff's Complaint in response to Paragraph 88 of Plaintiff's Complaint.

89. Paragraph 89 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

90. Paragraph 90 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

91. Paragraph 91 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

92. Paragraph 92 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

93. Paragraph 93 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

94. Paragraph 94 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

95. Paragraph 95 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

96. Paragraph 96 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

97. Paragraph 97 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

98. Paragraph 98 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

99. Paragraph 99 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

100. Paragraph 100 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

101. Paragraph 101 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

102. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 101 of this Answer to Plaintiff's Complaint in response to Paragraph 102 of Plaintiff's Complaint.

103. Paragraph 103 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

104. Paragraph 104 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

105. Paragraph 105 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

106. Paragraph 106 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

107. Paragraph 107 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

108. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 107 of this Answer to Plaintiff's Complaint in response to Paragraph 108 of Plaintiff's Complaint.

109. Paragraph 109 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

110. Paragraph 110 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

111. Paragraph 111 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

112. Paragraph 112 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

113. Paragraph 113 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

114. Paragraph 114 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

115. Paragraph 115 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

116. Paragraph 116 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

117. Paragraph 117 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

118. Paragraph 118 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

119. Paragraph 119 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

120. Paragraph 120 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

121. Paragraph 121 of the Plaintiff's Complaint makes no allegations

applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

122. Paragraph 122 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

123. Paragraph 123 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

124. Paragraph 124 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

125. Paragraph 125 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

126. Paragraph 126 of the Plaintiff's Complaint makes no allegations applicable to the Defendants, Angela Hobbs and Kristyn Taylor, and therefore a response is not required.

127. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 126 of this Answer to Plaintiff's Complaint in response to Paragraph 127 of Plaintiff's Complaint.

128. The Defendants, Angela Hobbs and Kristyn Taylor, deny the

allegations set forth in Paragraph 128 of the Plaintiff's Complaint and therefore demand strict proof thereof.

129. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 129 of the Plaintiff's Complaint and therefore demand strict proof thereof.

130. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 130 of the Plaintiff's Complaint and therefore demand strict proof thereof.

131. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 131 of the Plaintiff's Complaint and therefore demand strict proof thereof.

132. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 132 of the Plaintiff's Complaint and therefore demand strict proof thereof.

133. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 132 of this Answer to Plaintiff's Complaint in response to Paragraph 133 of Plaintiff's Complaint.

134. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 134 of the Plaintiff's Complaint and therefore demand strict proof thereof.

135. The Defendants, Angela Hobbs and Kristyn Taylor, deny the

allegations set forth in Paragraph 135 of the Plaintiff's Complaint and therefore demand strict proof thereof.

136. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 136 of the Plaintiff's Complaint and therefore demand strict proof thereof.

137. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 137 of the Plaintiff's Complaint and therefore demand strict proof thereof.

138. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 138 of the Plaintiff's Complaint and therefore demand strict proof thereof.

139. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 139 of the Plaintiff's Complaint and therefore demand strict proof thereof.

140. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 139 of this Answer to Plaintiff's Complaint in response to Paragraph 140 of Plaintiff's Complaint.

141. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 141 of the Plaintiff's Complaint and therefore demand strict proof thereof.

142. The Defendants, Angela Hobbs and Kristyn Taylor, deny the

allegations set forth in Paragraph 142 of the Plaintiff's Complaint and therefore demand strict proof thereof.

143. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 143 of the Plaintiff's Complaint and therefore demand strict proof thereof.

144. The Defendants, Angela Hobbs and Kristyn Taylor, restate the answers contained in Paragraphs 1 through 143 of this Answer to Plaintiff's Complaint in response to Paragraph 144 of Plaintiff's Complaint.

145. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 145 of the Plaintiff's Complaint and therefore demand strict proof thereof.

146. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 146 of the Plaintiff's Complaint and therefore demand strict proof thereof.

147. The Defendants, Angela Hobbs and Kristyn Taylor, deny the allegations set forth in Paragraph 147 of the Plaintiff's Complaint and therefore demand strict proof thereof.

AFFIRMATIVE DEFENSES

The Defendants, Angela Hobbs and Kristyn Taylor, assert any and all affirmative defenses including accord and satisfaction, arbitration and award, assumption of risk, contributory negligence, discharge in bankruptcy, duress, estoppel, failure of consideration, fraud, illegality, injury by fellow servant, laches,

license, payment and relief, res judicata, statute of frauds, statute of limitations, waiver or any other matter constituting an avoidance or affirmative defense and which may become apparent after discovery in this matter is completed.

The Plaintiffs failed to perfect service.

PRAYER

WHEREFORE, the Defendants, Angela Hobbs and Kristyn Taylor, request the Court dismiss this Complaint and award the Defendants, Angela Hobbs and Kristyn Taylor, their costs and attorney fees incurred in having to defend the same and for such other and further relief as the Court deems just.

The Defendants, Angela Hobbs and Kristyn Taylor, demand a Jury Trial in this matter.

ANGELA HOBBS and
KRISTYN TAYLOR

By Counsel,

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. Lafon
Timothy J. LaFon (WV #2123)
1219 Virginia Street, East, Suite 100
Charleston, West Virginia 25301
Phone: (304) 343-4440
Attorney for Defendants, Angela Hobbs and
Kristyn Taylor

CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Answer of Defendants, Angela Hobbs and Kristyn Taylor”** has been served upon all parties via the Court’s electronic filing system on the 2nd day of October, 2015:

Carte P. Goodwin, Esq.
300 Summers Street, Suite 1500
Charleston, West Virginia 25301
Attorney for Plaintiff

Kelli D. Talbott, Esq.
Office of the West Virginia Attorney General
404 Hamlet Way
Charleston, West Virginia 25314
Attorney for Defendant, West Virginia Department of
Administration, Purchasing Division

Webster J. Arceneaux, III, Esq.
Ramonda C. Lyons, Esq.
300 Summers Street, Suite 700
Charleston, West Virginia 25301
Attorney for Defendant, Innovative Resource Group, LLC d/b/a
APS Healthcare Midwest KEPRO Acquisitions, Inc.

Christopher S. Dodrill, Esq.
Office of the West Virginia Attorney General
812 Quarrier Street, Floor 6
Charleston, West Virginia 25301
Attorney for Defendant, West Virginia Department of Health
and Human Resources

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (WV #2123)
Attorney for Defendants, Angela Hobbs and
Kristyn Taylor